11.   A method for constructing a web based user interface, comprising:

providing an HTML template to a server, said HTML template including at least one

variable;

providing a plurality of data files to the server, each of said plurality of data files having

therein a different language data portion corresponding to said variable, the data portion

comprising predefined content;

selecting one of said plurality of data files; and

constructing an HTML encoded user interface file by substituting the data portion from

the selected one of said plurality of data files into said HTML template to replace said variable.

21.   A computer program product comprising a computer usable medium having a computer

readable code embodied thereon configured to operate on a computer, comprising:

a markup-language encoded template having a replacement variable within; and

a plurality of resource files containing data for replacing said replacement variable, said

replacement variable being selectively replaced by data from a selected one of said resource

files, each of the plurality of said resource files containing a predefined passage of text in a

different language such that said replacement variable will be replaced with a predefined passage

of text in a language governed by the selection of the selected one of said resource files.

22.   The computer program product of claim 21, wherein:

said resource files are HTML ResourceBundles that each contain alternative data to be

selectively substituted for said variables.

REMARKS

Claims 3-16 and 18-22 are currently pending. Further consideration of claims 3-16 and

18-22 in the light of the following remarks is respectfully requested.

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Rejections

Claims 3, 5-6, 11, 16 and 18-22 have been rejected under 35 USC § 103(a) as being unpatentable over Motoyama (U.S. 6,208,956). Claims 4, 7-8 and 14-15 have been rejected under 35 USC § 103 as being unpatentable over Motoyama in view of Levy (U.S. 5,944,790). Claims 9-10 and 12-13 have been rejected under 35 USC § 103(a) as being unpatentable over Motoyama in view of "How do I write an international application?" Dr. Dobbs Journal, July 1997, Cliff Berg (hereinafter "Berg").

In response to the office action, claims 3, 11 and 21 have been amended.

Before discussing the amendments in detail, the general differences between Motoyama and the invention should be considered. Motoyama is an automatic translation system in which, for one language into which a document is to be translated, a plurality of dictionaries and rules are defined. The different same-language dictionaries are used for different sections of a document.
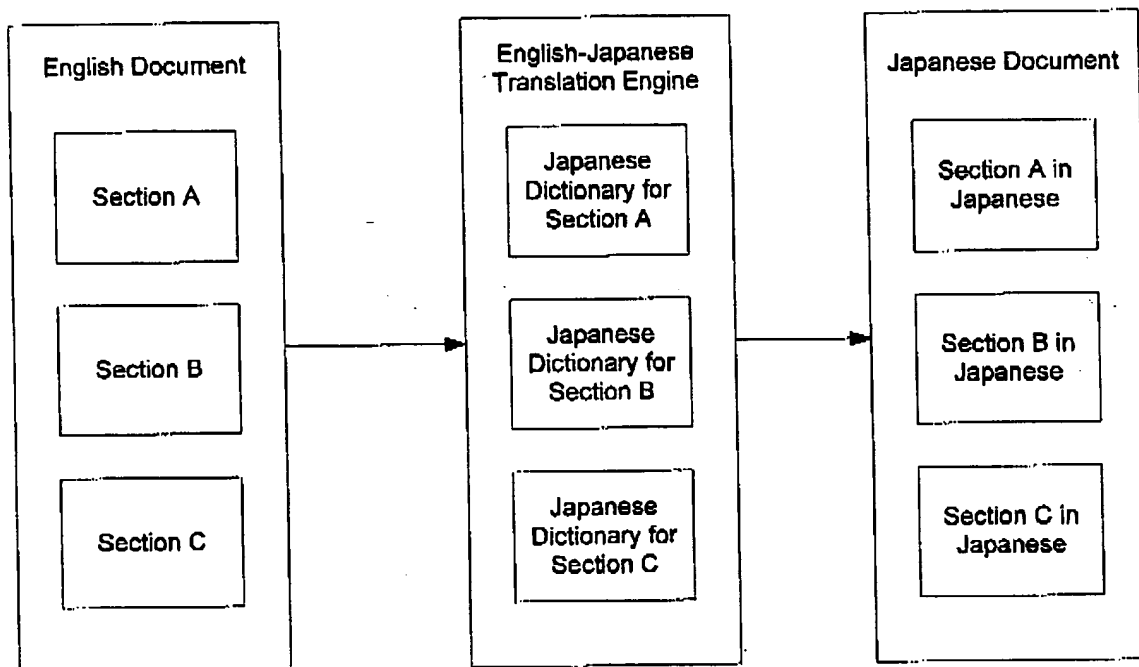
Using an analogy, in which sections or passages are assumed to be books, under Motoyama, if a German person walked into a library wanting to read German versions of two English books, one called "Introduction to Computing," and the other called "The Adventures of Huckleberry Finn," the clerk would hand the German speaker a copy of both of the books in the English language, a standard English to German dictionary, and an English to German technical dictionary and say: "Here is the English copy of 'Introduction to Computing,' and, as it is a technical book, you will have to translate it using this technical English to German dictionary. 'The Adventures of Huckleberry Finn' is non-technical, so please translate it using the standard English-German dictionary."

The invention, on the other hand, is concerned with the provision of predefined portions of content, or passages of text, that are already in the language of interest. That is, using the analogy above, the clerk would go to the section containing all of the pre-existing translations of these English books in a number of different languages (German, Swedish, French, Japanese, Italian, etc.), and select and hand the German person one copy of "Einleitung in ein Rechnen" and one copy of "Die Abenteuer von Huckleberry Finn."
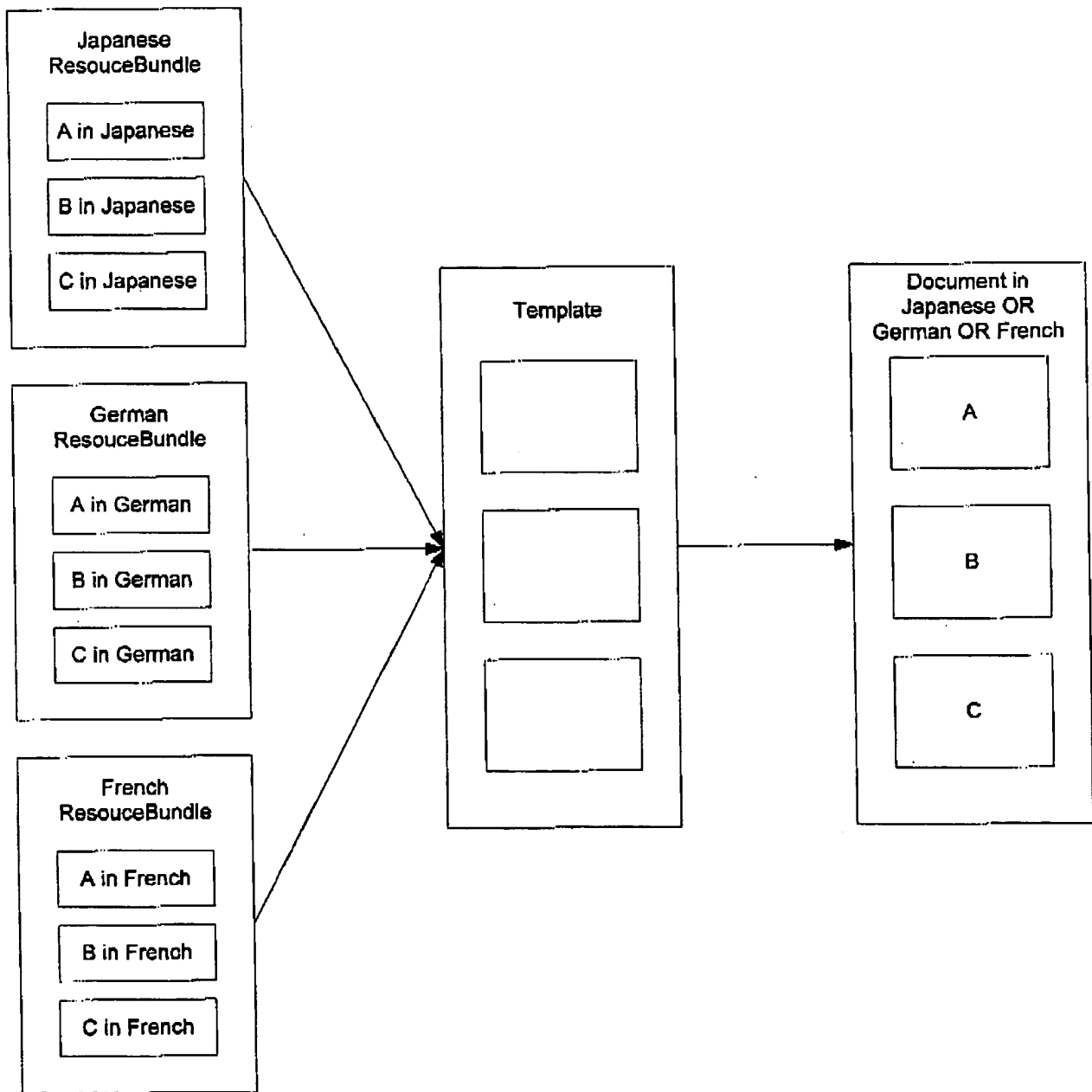
It can readily be appreciated that these are very different concepts. In fact, Motoyama repeatedly mentions the difficulties of ensuring correct translations, and provides for manual

intervention and correction, and repeatedly rejects the use of "canned phrases." See for example col. 2 ln. 60, col. 1 ln. 63 to col. 2 ln. 1.

The differences between Motoyama and the invention can be appreciated by referring to the following schematics illustrating embodiments of Montoya and the invention:

English Document	English-Japanese Translation Engine	Japanese Document
Section A	Japanese Dictionary for Section A	Section A in Japanese
Section B	Japanese Dictionary for Section B	Section B in Japanese
Section C	Japanese Dictionary for Section C	Section C in Japanese

Motoyama

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Japanese
ResouceBundle

A in Japanese

B in Japanese

C in Japanese

German
ResouceBundle

A in German

B in German

C in German

French
ResouceBundle

A in French

B in French

C in French

Template

Document in
Japanese OR
German OR French

A

B

C

Invention

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Claims 3 and 21 have been amended to define that each of the resource files contain a *predefined passage of text* in a different language, corresponding to the replacement variable. Claim 11 has been amended to define that the different–language data portion comprises *predefined content*.

Applicants submit that the current invention is patentable over the cited references for at least the following reasons:

Firstly, none of the applications alone or in combination teach the combination of a markup-language template with a plurality of different-language resources that are selectively substituted into the template, the resources comprising predefined passages of text or content. In particular, Montoya does not teach a plurality of *different language* resource files, the resource files containing *predefined passages of text* in a different language, for substitution into a replacement variable in a markup language *template*. Montoya teaches only a plurality of same-language dictionaries for use in translating a document. Also, Montoya does not teach the use of a template. Each document to be translated in Montoya appears to be unique, with its own unique structure that is replicated in the translated document. The structure of each unique document does not appear to be reused or adapted for use with many documents, in the form of a template.

The Examiner may attempt to argue that Montoya can be used with any language, and thus that multiple copies of the Montoya system in some way teaches a plurality of different language dictionaries. This is disingenuous, and is not relevant to the present invention. Firstly, this will result in a number of unrelated, stand–alone translation systems. Such a duplication will not result in a plurality of *different language* resource files, the resource files containing *predefined passages of text* in a different language, for *selective substitution* into a replacement variable in a markup language *template*.

Levy, on the other hand, teaches a system where versions of pages at a site are prepared in each language to be made available to the customer base. These different pages are assigned different permanent URLs, and include links to other pages in the same language. (Col. 5 lns. 53 – 57). Again, these are unrelated, stand–alone systems. As for Montoya, Levy does not show a markup-language template with a plurality of different-language resources that are selectively substituted into the template.

As set forth in MPEP 2140, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the

references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

Applicants submit that the current rejections do not meet any of these requirements. Firstly, there is no motivation to combine the single translation teachings of Montoya with the duplicate page technique of Levy. Secondly, there is little expectation of success, as Montoya and Levy do not appear to be compatible. In particular, the application of a "country code" in Levy to the standalone translation system of Montoya does not make sense, and is neither implied nor suggested. Thirdly, Montoya and Levy, alone or in combination, do not teach or suggest all of the claim limitations. For example, none of the references teach the use of a markup-language template with a plurality of different-language resources that are selectively substituted into the template. Berg does not make up for the discrepancies in Montoya and Levy.

Finally, Applicants note that the Examiner has rejected nine claims as obvious over a single reference, Motoyama. Thus, by the Examiner's own admission, Motoyama does not teach all of the limitations of these claims. This is further apparent from the rejections themselves, which in most cases rely on an improper hindsight construction using Applicants' teachings or unsupported statements that the invention is obvious over the cited art. For example, as regards claim 3, the Examiner states that Motoyama's disclosure of HTML "clearly suggests a template." Merely because the documents in Motoyama include formatting, this in no way suggests a template as claimed. A formatted document, formatted using a particular scheme, does not equate to a template into which various resources can be substituted. The Examiner is respectfully requested to support future rejections with prior art that in fact teaches the missing elements and limitations.

Applicants assert that independent claims 3, 11 and 21 and are patentable over Montoya, alone or in combination with any of the cited references. Claims 4-10, 12-16, 18-20 and 22 depend from one of the allowable independent claims and as such are allowable (notwithstanding their independent patentability) as being dependent on an allowable base claim.
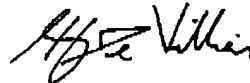
It is submitted that the application is in condition for allowance and an early notice thereof is solicited. In the event that a telephone conference would expedite prosecution of the

application, the Examiner is respectfully invited to contact the undersigned by telephone at the number set out below.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached pages are captioned "**VERSION WITH MARKINGS TO SHOW CHANGES MADE.**"

If for any reason an insufficient fee has been paid, the Commissioner is hereby authorized to charge any deficiency in payment of required fees associated with this communication to Deposit Account **02-3964.**

Respectfully submitted,
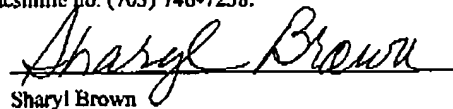
Dated: January 22, 2002

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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this paper (along with any referred to as being attached or enclosed) is being transmitted via facsimile on the date shown below, to Box AF, Assistant Commissioner of Patents, facsimile no. (703) 746-7238.

Date: January 22, 2002

Sharyl Brown

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<u>VERSION WITH MARKINGS TO SHOW CHANGES MADE</u>

The claims have been amended as follows in this office action. Unamended claims are also shown for convenience:

1.   (Cancelled)

2.   (Cancelled)

3.   (Twice Amended) A user interface, comprising:

a markup-language encoded template having a replacement variable within; and

a plurality of resource files containing data for replacing said replacement variable, said replacement variable being selectively replaced by data from a selected one of said resource files, each of the plurality of said resource files containing <u>a predefined passage of</u> text in a different language such that said replacement variable will be replaced with <u>a predefined passage of</u> text in a language governed by the selection of the selected one of said resource files.

4.   (Amended) The user interface of claim 3, wherein:

a particular one of the plurality of said resource files is selected according to a language code.

5.   (Amended) The user interface of claim 3, wherein:

said resource file is an HTML ResourceBundle.

6.   The user interface of claim 5, wherein:

said HTML ResourceBundle is alike in format to a conventional Java ResourceBundle.

7.   (Amended) The user interface of claim 3, wherein:

a constructed markup-language code is built at a server by combining said markup-language encoded template and data from said resource file.

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8.   (Amended) The user interface of claim 7, wherein:

the server builds the constructed markup-language code by substituting said replacement

variable with data from said resource file.

9.   (Amended) The user interface of claim 3, and further including:

Java code within said markup-language template; and

a JAR file containing a Java ResourceBundle.

10.   (Amended) The user interface of claim 3, and further including:

a plurality of said resource files such that said replacement variable is selectively

replaced by data from a selected one of said resource files to produce a constructed markup-

language code page;

Java code within said markup-language template; and

a JAR file containing a Java ResourceBundle; wherein

the constructed markup-language code page and the JAR file are transmitted to a

browser.

11.   (Twice Amended) A method for constructing a web based user interface, comprising:

providing an HTML template to a server, said HTML template including at least one

variable;

providing a plurality of data files to the server, each of said plurality of data files having

therein a different language data portion corresponding to said variable, **the data portion**

comprising predefined content;

selecting one of said plurality of data files; and

constructing an HTML encoded user interface file by substituting the data portion from

the selected one of said plurality of data files into said HTML template to replace said variable.

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12.   The method of claim 11, wherein:

said HTML template includes Java code; and

a plurality of Java ResourceBundles are provided such that when said Java code executes

then data from a selected one of said Java ResourceBundles is provided in a Java Applet in the

web based user interface.

13.   The method of claim 12, wherein:

the plurality of Java ResourceBundles are combined into a JAR file and transmitted from

the server to a browser along with said HTML encoded interface.

14.   The method of claim 11, wherein:

a language code is sent from a browser to the server; and

the one of said plurality of data files is selected according to the language code.

15.   The method of claim 14, wherein:

the language code is selected to indicate a particular language such that the one of said

plurality of data files is selected according to the language desired.

16.   The method of claim 11, wherein:

each of the plurality of data files is in the form of a ResourceBundle.

17.   (Cancelled)

18.   The method of claim 11, wherein:

each of the plurality of data files contains data arranged in key/value combinations such

that the key is identical to said variable and the value is the data to be substituted for the variable.

19.   The method of claim 18, wherein:

the key/value pair is delineated by curly brackets; and

the key is separated from the value by a comma.

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20.   The method of claim 11, wherein:

said variable is delineated within said HTML template by pound signs.

21.   (Twice Amended) A computer program product comprising a computer usable medium

having a computer readable code embodied thereon configured to operate on a computer,

comprising:

a markup-language encoded template having a replacement variable within; and

a plurality of resource files containing data for replacing said replacement variable, said

replacement variable being selectively replaced by data from a selected one of said resource

files, each of the plurality of said resource files ~~contains~~ **containing a predefined passage of**

text in a different language such that said replacement variable will be replaced with **a**

predefined passage of text in a language governed by the selection of the selected one of said

resource files.

22.   (Amended) The computer program product of claim 21, wherein:

said resource files are HTML ResourceBundles that each contain alternative data to be

selectively substituted for said variables.

23.   (Cancelled)

24.   (Cancelled)

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